

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF NEW YORK

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TERRANCE CASH,

Plaintiff,

vs.

**NOTICE OF REMOVAL OF  
ACTION (28 U.S.C. §1441(b))  
Federal Question**

Civil Action No.

COUNTY OF ERIE, CHRISTINE GREEN,  
JASON PULEO, KIMBERLY WILGUS,  
MARK FRANCZYK, DERRICK NEELY,  
KEITH DUNLAP, BRENDAN WHEELER,  
KATE WARRINGTON, TIMOTHY GAWLAK,  
WILLIAM PAGE, JUSTIN BAUER,  
SHAUN B. HEDIGER, JONATHAN WIER,  
RYAN WALKER, RICHEL DELORENZO,  
JOHN DiMARTINO, JEROME STACHURA,  
SEAN MEIRER, TAMARA BARNAS  
“RICHARD ROE” SHERIFF’S DEPUTIES  
1-10 and other unidentified members of the  
Erie County Sheriff’s Office,

Defendants.

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TO THE CLERK OF THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF NEW YORK

**PLEASE TAKE NOTICE** that, pursuant to 28 U.S.C. §§1441(b) and 1446, defendants,  
ERIE COUNTY, CHRISTINE GREEN, JASON PULEO, KIMBERLY WILGUS, MARK  
FRANCZYK, DERRICK NEELY, KEITH DUNLAP, BRENDAN WHEELER, KATE  
WARRINGTON, TIMOTHY GAWLAK, WILLIAM PAGE, JUSTIN BAUER, SHAUN B.  
HEDIGER, JONATHAN WIER, RYAN WALKER, RICHEL DELORENZO, JOHN  
DiMARTINO, JEROME STACHURA, SEAN MEIRER, and TAMARA BARNAS, hereby

remove to this Court the civil action filed in the Supreme Court of the State of New York, County of Erie, as described below.

On April 8, 2025, Plaintiff, Terrance Cash, filed a civil action entitled “Terrance Cash v. Erie County, et al.,” Index Number 806247/2025, in the Supreme Court for the State of New York, County of Erie.

On May 9, 2025 and May 21, 2025, Plaintiff Terrance Cash served the defendants with the Summons and Complaint in the above-referenced state court action. **Exhibit A.**

On May 21, 2025, defendants filed an answer. **Exhibit B.**

No further proceedings have been had in the state court action. Plaintiff’s Complaint contains causes of action pursuant to 42 U.S.C. § 1983 alleging that defendants violated his civil rights under the Fourth and Fourteenth Amendment to the United States Constitution.

Accordingly, this Court has original jurisdiction over the state court action under 28 U.S.C. §1331 (federal question) because it is a civil action that arises under the Constitution, laws, or treaties of the United States.

No previous application has been made for the relief requested herein.

Dated: Buffalo, New York  
May 22, 2025

JEREMY C. TOTH, Erie County Attorney  
Attorney for Answering Defendants

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